

**CAUSE NO. A-209040**

<b>MARIA ISABEL RAMIREZ, MANUEL</b>	<b>§</b>	<b>IN THE DISTRICT COURT OF</b>
<b>RAMIREZ, SR., EACH INDIVIDUALLY</b>	<b>§</b>	
<b>&amp; AS REPRESENTATIVES OF THE</b>	<b>§</b>	
<b>ESTATE OF MAUEL RAMIREZ, JR.;</b>	<b>§</b>	
<b>AMISADAI PEREZ CASTELLANOS</b>	<b>§</b>	
<b>ANF OF Z___, A MINOR AND SYLVIA</b>	<b>§</b>	<b>JEFFERSON COUNTY, TEXAS</b>
<b>GOMEZ ANF OF N___ AND E___, A</b>	<b>§</b>	
<b>MINOR.</b>	<b>§</b>	
	<b>§</b>	
<b>VS.</b>	<b>§</b>	
	<b>§</b>	
<b>RCI HOSPITALITY HOLDINGS AND</b>	<b>§</b>	
<b>CITY OF BEAUMONT</b>	<b>§</b>	<b>58<sup>th</sup> JUDICIAL DISTRICT</b>

**NOTIFICATION OF PETITION TO REMOVE**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, CITY OF BEAUMONT, Defendant in the above-styled and numbered cause, and files this, their Notification of Petition to Remove, and would show the Court the following:

I.

Plaintiff's Petition purportedly alleges violations of the federal constitution and seeks relief pursuant to 42 U.S.C. §1983. Pursuant to the provisions of 28 U.S.C. §1441, removal of an action from state court to federal court is authorized if the claim[s] arise under the laws of the United States. Attached hereto as Exhibit A is a copy of the Petition for Removal of this action that has been or will be filed with the United States District Court for the Eastern District of Texas, Beaumont Division.

Respectfully submitted,

/s/ Sharae N. Reed

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State Bar No. 24068467

ATTORNEY FOR DEFENDANTS,  
City of Beaumont

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing has been transmitted to all known counsel of record on this the 2<sup>nd</sup> day of February, 2022, by the following method:

☐ United States Postal Service, Certified Mail, Return Receipt Requested;  
☐ Hand-Delivery;  
☐ Federal Express;  
☐ Telefacsimile;  
☒ E-File.

/s/ Sharae N. Reed

\_\_\_\_\_  
Sharae N. Reed



3. Plaintiffs' Petition purports to state claims and seek relief arising under the laws of the United States, namely 42 U.S.C. §1983. As such, these purported federal claims are among those for which this Court has jurisdiction pursuant to the provisions of 28 U.S.C §1441.

4. In satisfaction of the notice requirement of 28 U.S.C. §1446(d), Petitioner is contemporaneously filing a copy of this instrument with Honorable W. Kent Walston, 58<sup>th</sup> Judicial District Court, and forwarding a copy of same Plaintiff.

WHEREFORE, PREMISES CONSIDERED, Petitioner requests an evidentiary hearing be held promptly, that the above styled cause be removed to the United States District Court, that the state court be notified of the removal of said cause and for all such further relief to which Petitioner shows himself entitled.

Respectfully submitted,

/s/ Sharae N. Reed

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/s/ Sharae N. Reed

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